



Control Number: 49737



Item Number: 69

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APPLICATION OF SOUTHWESTERN §
ELECTRIC POWER COMPANY FOR §
CERTIFICATE OF CONVENIENCE §
AND NECESSITY AUTHORIZATION §
AND RELATED RELIEF FOR THE §
ACQUISITION OF WIND §
GENERATION FACILITIES §

2019 AUG 20 PM 1:59
PUBLIC UTILITY COMMISSION

OF TEXAS

**SOUTHWESTERN ELECTRIC POWER COMPANY'S REVISED PRIVILEGE INDEX
FOR TEXAS INDUSTRIAL ENERGY CONSUMERS' SECOND SET OF REQUESTS
FOR INFORMATION**

Southwestern Electric Power Company (SWEPCO) provides the attached revised privilege index, marked as Exhibit A, prepared in accordance with 16 Tex. Admin. Code (TAC) § 22.144(d)(2) for privileged information responsive to Request for Information (RFI) No. 2-4 in the Second Set of RFIs from Texas Industrial Energy Consumers (TIEC).

To date, SWEPCO has not identified any privileged documents responsive to this request other than the materials identified on the attached privilege index. SWEPCO recognizes that it is under a continuing obligation to supplement discovery responses. If SWEPCO identifies any additional privileged documents, it will provide a supplemental privilege index at that time.

Respectfully submitted,

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**ATTORNEYS FOR SOUTHWESTERN
ELECTRIC POWER COMPANY.**

CERTIFICATE OF SERVICE

I certify that a true and correct copy of this motion was served on all parties of record this
30th day of August, 2019.

Stephanie Green
Stephanie Green

Item No.	RFI No.	Bates No.	Document Title (Date)	Preparer/Custodian ¹	Recipients ¹	Privilege Claimed	Explanation
1	TIEC 2-4	000001	Wind RFP (11/28/2018)	Bobby Gilliam	Antonio P Smyth, Raja Sundararajan, Tom Brice, John C Crespo, Shelli A Sloan, Jay F Godfrey CC: Jonathan McCartney, Patrick T. Wiggins, Monica Locke, Emily Bearden	Attorney-Client Communication	E-mail from counsel rendering legal opinion on applicability of order to RFP criteria as it relates to unit ownership
2	TIEC 2-4	000002	CSP EEI Info (11/7/2018)	Antonio Smyth	Tom Brice, Steven Fate, Raja Sundararajan, Adam Hickman, Brian Weber, John Crespo, JS Solomon, Jay Godfrey, Shelli Sloan	Attorney-Client Communication; Work Product	E-mail transmitting draft talk points reflecting draft regulatory messaging about the North Central Wind Energy Facilities ("NCEF"), including those related to unit ownership, prepared at the request of counsel in anticipation of regulatory litigation

¹ The following individuals are in-house counsel for American Electric Power Service Corporation ("AEPSC") and its affiliates: John Crespo, Randy Ryan, Joann Worthington, Melissa Gage, and Jerry Huerta. Outside counsel also representing SWEPCO or PSO includes Bobby Gilliam, Jonathan McCartney, Patrick T. Wiggins, Monica Locke, and Emily Bearden. All other preparers and recipients reflect AEPSC/SWEPCO/PSO.

Item No.	RFI No.	Bates No.	Document Title (Date)	Preparer/ Custodian¹	Recipients¹	Privilege Claimed	Explanation
3	TIEC 2-4	000003-000006	Customer Savings Plan Q&A (11/7/2018)	Antonio Smyth	Tom Brice, Steven Fate, Raja Sundararajan, Adam Hickman, Brian Weber, John Crespo, JS Solomon, Jay Godfrey, Shelli Sloan	Attorney-Client Communication; Work Product	Draft talk points reflecting draft regulatory messaging about NCEF, including those related to unit ownership, prepared at the request of counsel in anticipation of regulatory litigation
4	TIEC 2-4	000007	Regulatory Litigation Communication Plan (11/13/2018)	John Crespo	Brian Weber, Antonio Smyth, Adam Hickman, Peggy Simmons, Malcom Smoak, Steven Fate, Tom Brice, Emily Shuart, Mellissa McHenry, Carey Sullivan, Tiffini Jackson, Raja Sundararajan, Jay Godfrey, JS Solomon, Tammy Ridout; cc: Joann Worthington, Melissa Gage, Jerry Huerta	Attorney-Client Communication; Work Product	Counsel's request for assistance to develop communication plans and regulatory messaging in anticipation of and for use during regulatory litigation

Item No.	RFI No.	Bates No.	Document Title (Date)	Preparer/ Custodian¹	Recipients¹	Privilege Claimed	Explanation
5	TIEC 2-4	000008	Re: CSP EEI Info (11/7/2018)	Steven Fate	Antonio Smyth, Tom Brice, Raja Sundararajan, Adam Hickman, Brian Weber, John Crespo, JS Solomon, Jay Godfrey, Shelli Sloan; cc: Emily Shuart	Attorney-Client Communication; Work Product	E-mail transmitting comments on draft talk points reflecting draft regulatory messaging about NCEF, including those related to unit ownership, prepared at the request of counsel in anticipation of regulatory litigation
6	TIEC 2-4	000009-000012	SWEPCO & PSO Customer Savings Plan Slide (11/7/2018)	Steven Fate	Antonio Smyth, Tom Brice, Raja Sundararajan, Adam Hickman, Brian Weber, John Crespo, JS Solomon, Jay Godfrey, Shelli Sloan	Attorney-Client Communication; Work Product	Comments on draft talk points reflecting draft regulatory messaging about NCEF, including those related to unit ownership, prepared at the request of counsel in anticipation of regulatory litigation

Item No.	RFI No.	Bates No.	Document Title (Date)	Preparer/ Custodian¹	Recipients¹	Privilege Claimed	Explanation
7	TIEC 2-4	000013	RE: Customer Savings Plan – External Communications Plan (11/13/2018)	Carey Sullivan	Tiffini Jackson, John Crespo; cc: Brian Weber, Antonio Smyth, Adam Hickman, Peggy Simmons, Malcom Smoak, Steven Fate, Tom Brice, Emily Shuart, Melissa McHenry, Raja Sundararajan, Jay Godfrey, JS Solomon, Tammy Ridout, Joann Worthington, Melissa Gage, Jerry Huerta	Attorney-Client Communication; Work Product	E-mail transmitting draft SWEPCO communication plan and draft messaging for the NCEF regulatory proceedings, including those related to unit ownership, prepared at the request of counsel in anticipation of regulatory litigation
8	TIEC 2-4	000014-000019	SWEPCO Wind RFP Comm Plan 11-13-18	Carey Sullivan	Tiffini Jackson, John Crespo; cc: Brian Weber, Antonio Smyth, Adam Hickman, Peggy Simmons, Malcom Smoak, Steven Fate, Tom Brice, Emily Shuart, Melissa McHenry, Raja Sundararajan, Jay Godfrey, JS Solomon, Tammy Ridout, Joann Worthington, Melissa Gage, Jerry Huerta	Attorney-Client Communication; Work Product	Draft SWEPCO communication plan and draft messaging for the NCEF regulatory proceedings, including those related to unit ownership, prepared at the request of counsel in anticipation of regulatory litigation

Item No.	RFI No.	Bates No.	Document Title (Date)	Preparer/ Custodian¹	Recipients¹	Privilege Claimed	Explanation
9	TIEC 2-4	000020	RE: Customer Savings Plan – External Communications Plan (11/13/2018)	Tiffini Jackson	John Crespo; cc: Brian Weber, Antonio Smyth, Adam Hickman, Peggy Simmons, Malcom Smoak, Steven Fate, Tom Brice, Emily Shuart, Melissa McHenry, Carey Sullivan, Raja Sundararajan, Jay Godfrey, JS Solomon, Tammy Ridout, Joann Worthington, Melissa Gage, Jerry Huerta	Attorney-Client Communication; Work Product	E-mail transmitting draft PSO communication plan and draft messaging for the NCEF regulatory proceedings, including those related to unit ownership, prepared at the request of counsel in anticipation of regulatory litigation
10	TIEC 2-4	000021-000027	PSO 2019 Wind RFP Comms 11 13	Tiffini Jackson	John Crespo; cc: Brian Weber, Antonio Smyth, Adam Hickman, Peggy Simmons, Malcom Smoak, Steven Fate, Tom Brice, Emily Shuart, Melissa McHenry, Carey Sullivan, Raja Sundararajan, Jay Godfrey, JS Solomon, Tammy Ridout, Joann Worthington, Melissa Gage, Jerry Huerta	Attorney-Client Communication; Work Product	Draft PSO communication plan and draft messaging for the NCEF regulatory proceedings, including those related to unit ownership, prepared at the request of counsel in anticipation of regulatory litigation

Item No.	RFI No.	Bates No.	Document Title (Date)	Preparer/ Custodian¹	Recipients¹	Privilege Claimed	Explanation
11	TIEC 2-4	000028	RE: Louisiana Feedback and Potential CSP Revisions (12/10/2018)	Brian Weber	Randy G Ryan, Antonio P Smyth, Jay F Godfrey, John C Crespo, Raja Sundararajan, Tom Brice, Steven Fate	Attorney-Client Communication; Work Product	E-mail transmitting document reflecting draft messaging related to unit ownership, developed for purposes of discussion with counsel
12	TIEC 2-4	000029-000030	Comparison (12/10/2018)	Brian Weber	Randy G Ryan, Antonio P Smyth, Jay F Godfrey, John C Crespo, Raja Sundararajan, Tom Brice, Steven Fate	Attorney-Client Communication; Work Product	Document reflecting draft messaging related to unit ownership, developed for purposes of discussion with counsel
13	TIEC 2-4	000031	Conf Call (12/5/2018)	Tom Brice	Bobby Gilliam	Attorney-Client Communication	E-mail requesting counsel's assistance with discussion of aspect of RFP
14	TIEC 2-4	000032	RE: EEI CSP Info (11/7/2018)	John Crespo	Antonio Smyth	Attorney-Client Communication; Work Product	E-mail communicating counsel's comments on draft talk points reflecting draft regulatory messaging about NCEF, including those related to unit ownership

Item No.	RFI No.	Bates No.	Document Title (Date)	Preparer/ Custodian¹	Recipients¹	Privilege Claimed	Explanation
15	TIEC 2-4	000033	RE: CSP EEI Info (11/7/2018)	Steven Fate	JS Solomon	Work Product	E-mail developing/ discussing draft messaging on topic of unit ownership, prepared at the request of counsel in anticipation of litigation
16	TIEC 2-4	000033	RE: CSP EEI Info (11/7/2018)	JS Solomon	Steven Fate	Work Product	E-mail developing/ discussing draft messaging on topic of unit ownership, prepared at the request of counsel in anticipation of litigation
17	TIEC 2-4	000033	RE: CSP EEI Info (11/7/2018)	Steven Fate	Antonio Smyth, Tom Brice, Raja Sundararajan, Adam Hickman, Brian Weber, John Crespo, JS Solomon, Jay Godfrey, Shelli Sloan; cc: Emily Shuart	Attorney-Client Communication; Work Product (duplicate of Item No. 5 above)	E-mail transmitting comments on draft talk points reflecting draft regulatory messaging about NCEF, including those related to unit ownership, prepared at the request of counsel in anticipation of regulatory litigation

Item No.	RFI No.	Bates No.	Document Title (Date)	Preparer/ Custodian¹	Recipients¹	Privilege Claimed	Explanation
18	TIEC 2-4	000033-000034	CSP EEI Info (11/7/2018)	Antonio Smyth	Tom Brice, Steven Fate, Raja Sundararajan, Adamn Hickman, Brian Weber, John Crespo, JS Solomon, Jay Godfrey, Shelli Sloan	Attorney-Client Communication; Work Product (duplicate of Item No. 2 above)	E-mail transmitting draft talk points reflecting draft regulatory messaging about NCEF, including those related to unit ownership, prepared at the request of counsel in anticipation of regulatory litigation
19	TIEC 2-4	000035-000044	SWEPCO and PSO Customer Savings Plan (10/18/2018)	Adam Hickman	Jay Godfrey	Work Product	Draft document summarizing NCEF project, including draft regulatory messaging prepared at the direction of counsel in anticipation of regulatory litigation related to unit ownership
20	TIEC 2-4	000045	RE: Follow-up draft from recent RFP design workshop (10/22/2018)	Jay Godfrey	JS Solomon	Work Product	E-mail developing/ discussing draft messaging on topic of unit ownership, prepared at the request of counsel in anticipation of litigation

Item No.	RFI No.	Bates No.	Document Title (Date)	Preparer/ Custodian¹	Recipients¹	Privilege Claimed	Explanation
21	TIEC 2-4	000045-000046	RE: Follow-up draft from recent RFP design workshop (10/19/2018)	JS Solomon	Jay Godfrey	Work Product	E-mail discussing draft messaging on topic of unit ownership, prepared at the request of counsel in anticipation of litigation
22	TIEC 2-4	000047	Answers to Questions (11/11/2018)	Antonio Smyth	Paul Chodak	Work Product	E-mail conveying draft messaging on topic of unit ownership, prepared at the request of counsel in anticipation of litigation
23	TIEC 2-4	000048	Attached is a draft CSP Work Plan (10/11/2018)	Brian Weber	Antonio Smyth	Work Product	E-mail transmitting draft regulatory work plan for NCEF project (see Item No. 24)
24	TIEC 2-4	000049-000063	CSP Work Plan (10/11/2018)	Brian Weber	Antonio Smyth	Work Product	Draft regulatory work plan for NCEF project including anticipated timelines, regulatory requirements, project scope, and statements related to unit ownership prepared at the request of counsel in anticipation of regulatory litigation

Item No.	RFI No.	Bates No.	Document Title (Date)	Preparer/ Custodian¹	Recipients¹	Privilege Claimed	Explanation
25	TIEC 2-4	000064	CSP Communications Plan – request for input/feedback (11/20/2018)	Adam Hickman	Antonio Smyth, Brian Weber	Work Product	E-mail transmitting draft consolidated communication plan and draft messaging for the NCEF regulatory proceedings, including those related to unit ownership, prepared at the request of counsel in anticipation of regulatory litigation
26	TIEC 2-4	000065-000076	Comprehensive Communications Plan v.1 (11/20/2018)	Adam Hickman	Antonio Smyth, Brian Weber	Work Product	Draft consolidated communication plan and draft messaging for the NCEF regulatory proceedings, including those related to unit ownership, prepared at the request of counsel in anticipation of regulatory litigation

Item No.	RFI No.	Bates No.	Document Title (Date)	Preparer/ Custodian¹	Recipients¹	Privilege Claimed	Explanation
27	TIEC 2-4	000077	CSP Slides (10/18/2018)	Antonio Smyth	JS Solomon	Work Product	E-mail transmitting draft power point document summarizing NCEF project, portions of which include draft regulatory messaging, including statements related to unit ownership, prepared at the direction of counsel in anticipation of regulatory litigation
28	TIEC 2-4	000078-000089	SWEPCO and PSO Customer Savings Plan (10/18/2018)	Antonio Smyth	JS Solomon	Work Product	Draft power point document summarizing NCEF project, portions of which include draft regulatory messaging, including statements related to unit ownership, prepared at the direction of counsel in anticipation of regulatory litigation

Item No.	RFI No.	Bates No.	Document Title (Date)	Preparer/ Custodian¹	Recipients¹	Privilege Claimed	Explanation
29	TIEC 2-4	000090	RE: Regulatory Talking Points – CSP (10/26/2018)	JS Solomon	Adam Hickman, Antonio Smyth, Raja Sundararajan, Brian Weber; cc: Shelli Sloan	Work Product	E-mail reflecting comments on draft regulatory messaging for NCEF project, including statements related to unit ownership, prepared at the direction of counsel in anticipation of regulatory litigation
30	TIEC 2-4	000091	RE: Regulatory Talking Points – CSP (10.25.2018)	Adam Hickman	JS Solomon, Antonio Smyth, Raja Sundararajan, Brian Weber	Work Product	E-mail transmitting draft regulatory messaging for NCEF project, including statements related to unit ownership, prepared at the direction of counsel in anticipation of regulatory litigation
31	TIEC 2-4	000092-000093	SWEPCO and PSO Customer Savings Plan Regulatory Talk Points (10/25/2018)	Adam Hickman	JS Solomon, Antonio Smyth, Raja Sundararajan, Brian Weber	Work Product	Draft regulatory messaging for NCEF project, including statements related to unit ownership, prepared at the direction of counsel in anticipation of regulatory litigation

Item No.	RFI No.	Bates No.	Document Title (Date)	Preparer/Custodian¹	Recipients¹	Privilege Claimed	Explanation
32	TIEC 2-4	000094	RE: Regulatory Talking Points – CSP (10/26/2018)	Adam Hickman	JS Solomon, Antonio Smyth, Raja Sundararajan, Brian Weber; cc: Shelli Sloan	Work Product	E-mail transmitting draft regulatory messaging for NCEF project, including statements related to unit ownership, prepared at the direction of counsel in anticipation of regulatory litigation
33	TIEC 2-4	000095-000096	PSO Customer Savings Plan_Regulatory Talking Points (10/26/2018)	Adam Hickman	JS Solomon, Antonio Smyth, Raja Sundararajan, Brian Weber; cc: Shelli Sloan	Work Product	Draft regulatory PSO messaging for NCEF project, including statements related to unit ownership, prepared at the direction of counsel in anticipation of regulatory litigation
34	TIEC 2-4	000097-000098	SWEPCO Customer Savings Plan_Regulatory Talking Points (10/26/2018)	Adam Hickman	JS Solomon, Antonio Smyth, Raja Sundararajan, Brian Weber; cc: Shelli Sloan	Work Product	Draft regulatory SWEPCO messaging for NCEF project, including statements related to unit ownership, prepared at the direction of counsel in anticipation of regulatory litigation

Item No.	RFI No.	Bates No.	Document Title (Date)	Preparer/ Custodian¹	Recipients¹	Privilege Claimed	Explanation
35	TIEC 2-4	000099	RE: Regulatory talking points – CSP (10/25/2018)	JS Solomon	Adam Hickman, Antonio Smyth, Raja Sundararajan, Brian Weber	Work Product	E-mail transmitting draft regulatory messaging for NCEF project, including statements related to unit ownership, prepared at the direction of counsel in anticipation of regulatory litigation
36	TIEC 2-4	000100-000101	Customer Savings Plan (10/25/2018)	JS Solomon	Adam Hickman, Antonio Smyth, Raja Sundararajan, Brian Weber	Work Product	Draft regulatory messaging for NCEF project, including statements related to unit ownership, prepared at the direction of counsel in anticipation of regulatory litigation
37	TIEC 2-4	000102	Updated CSP Slide & Points (11/7/2018)	Antonio Smyth	Bette Rozsa, Darcy Reese, Mark McCullough, Paul Chodak, Lisa Barton, Charles Patton, Raja Sundararajan, JS Solomon	Work Product	E-mail transmitting Item No. 3 above